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6 Attorneys for Defendant
MICHAEL GARCIA
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,) Case No. 2:20-CR-181-JAM-1
12 Plaintiff,)
13 vs.) STIPULATION AND ORDER TO
14 MICHAEL GARCIA, et al.,) CONTINUE STATUS CONFERENCE AND
15 Defendant.) EXCLUDE TIME
16)
) Date: September 14, 2021
) Time: 9:30 a.m.
) Judge Hon. John A. Mendez

17 IT IS HEREBY STIPULATED by and between Phillip A. Talbert, Acting United States
18 Attorney, through Adrian Kinsella, Assistant United States Attorney, counsel for Plaintiff
19 (hereinafter “the government”), Michael Long, counsel for Defendant Nancy Garcia and Heather
20 Williams, Federal Defender, through Assistant Federal Defender Lexi Negin, counsel for
21 Defendant Michael Garcia (hereinafter “defense counsel”), **that the status conference**
22 **scheduled for September 14, 2021 may be vacated and continued to October 19, 2021 at**
23 **9:30 a.m.**

24 Defense counsel requires additional time to review discovery, conduct further legal
25 research; meet with their clients to discuss potential resolution; and otherwise prepare for the
26 motion hearing. Defense counsel believes that failure to grant the requested continuance would
27 deny defendants the reasonable time necessary for effective preparation, taking into account the
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1 exercise of due diligence. The government does not object to the continuance.

2 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
3 excluded through and including October 19, 2021; pursuant to 18 U.S.C. §3161(h)(7)(A) and
4 (B)(iv) [reasonable time to prepare] and General Order 479, Local Code T4 based upon defense
5 preparation.

6 Respectfully submitted,

7 HEATHER E. WILLIAMS
8 Federal Defender

9 Date: September 8, 2021

/s/ Lexi Negin

10 LEXI NEGIN
11 Assistant Federal Defender
Attorneys for Defendant
MICHAEL GARCIA

12 Date: September 8, 2021

/s/ Michael Long

13 MICHAEL LONG
14 Assistant Federal Defender
Attorneys for Defendant
NANCY GARCIA

15 Date: September 8, 2021

16 PHILLIP A. TALBERT
Acting United States Attorney

/s/ Adrian Kinsella

17 ADRIAN KINSELLA
18 Assistant United States Attorney
Attorneys for Plaintiff
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ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

The Court orders the time excluded from September 14, 2021 to October 19, 2021 from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for defense counsel to prepare] and General Order 479, (Local Code T4). The Court finds the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial. It is further ordered the September 14, 2021 status conference shall be continued until October 19, 2021, at 9:30 a.m. before Honorable John A. Mendez.

IT IS SO ORDERED.

Dated: 9/8/2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE